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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MIGUEL ZUNIGA ARTEAGA,  
ARMANDO MARTINEZ,  
MIGUEL ANGEL SANCHEZ-MEZA,  
JUAN VIZUETT-RESENDIZ, and  
VINCENTE SALVADOR ARENAS-GARCIA,  
  
Defendants.

CASE NO. 1:20-CR-00212 ADA-BAM

STIPULATION TO VACATE TRIAL DATE, AND  
EXCLUDE TIME PERIODS UNDER THE SPEEDY  
TRIAL ACT; [PROPOSED] ORDER

CURRENT DATE: December 14, 2022  
COURT: Hon. Ana de Alba

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By this stipulation, the government and defendant now move to vacate the trial confirmation and jury trial set for October 17, 2023, and set a further status conference date on October 25, 2023, and to exclude time between December 14, 2022, and October 25, 2023, under Local Code T4.

2. The parties agree and stipulate, and request that the Court find the following:

a) The parties represent that the attorney for the government recently was reassigned this matter.

b) No plea agreement has been extended despite the age of this matter.

1 c) The government plans to provide counsel and defendant with a plea agreement  
2 before the requested status conference date.

3 d) Counsel for defendant desires additional time to further review discovery, discuss  
4 potential resolution with his/her client and the government, and investigate and prepare for trial.

5 e) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
7 into account the exercise of due diligence.

8 f) The parties are prepared to set a trial date upon assessment of the above  
9 considerations by counsel, and if no resolution in the matter results.

10 g) Based on the above-stated findings, the ends of justice served by continuing the  
11 case as requested outweigh the interest of the public and the defendant in a trial within the  
12 original date prescribed by the Speedy Trial Act.

13 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
14 et seq., within which trial must commence, the time period of December 14, 2022 to October 25,  
15 2023 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
16 T4] because it results from a continuance granted by the Court at the parties' request on the basis  
17 of the Court's finding that the ends of justice served by taking such action outweigh the best  
18 interest of the public and the defendants in a speedy trial.

19 i) The parties also agree that this continuance is necessary for several reasons,  
20 including but not limited to, the need to permit time for the parties to exchange supplemental  
21 discovery, engage in plea negotiations, and for the defense to continue its investigation and  
22 preparation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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3. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 24, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ STEPHANIE M. STOKMAN  
STEPHANIE M. STOKMAN  
Assistant United States Attorney

Dated: August 24, 2023

/s/ NICHOLAS REYES  
NICHOLAS REYES  
Counsel for Defendant  
MIGUEL ZUNIGA ARTEAGA

Dated: August 24, 2023

/s/ NICHOLAS REYES  
NICHOLAS REYES  
Counsel for Defendant  
ARMANDO MARTINEZ

Dated: August 24, 2023

/s/ RICHARD A. BESHWATE  
RICHARD A. BESHWATE  
Counsel for Defendant  
MIGUEL ANGEL SANCHEZ-  
MEZA

Dated: August 24, 2023

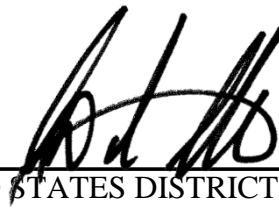
/s/ MONICA BERMUDEZ  
MONICA BERMUDEZ  
Counsel for Defendant  
JUAN VIZUETT-RESENDIZ

Dated: August 24, 2023

/s/ HARRY DRANDELL  
HARRY DRANDELL  
Counsel for Defendant  
VINCENTE SALVADOR  
ARENAS-GARCIA

IT IS SO ORDERED.

Dated: September 6, 2023

  
UNITED STATES DISTRICT JUDGE